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8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA**
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11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 CB SURETY LLC, et al.,

15 Defendants.
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Case No. 2:23-cv-02812-TLN-DB
(Assigned to Hon. Troy L. Nunley)

**NOTICE OF MOTION AND
MOTION TO SUBSTITUTE
RECEIVER**

Date: October 2, 2025
Time: 2:00 p.m.
Crtrm: 2

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on October 2, 2025, at 2:00 p.m., or as soon thereafter as the matter may be heard in Courtroom 2 of the above-entitled Court, located at the Robert T. Matsui United States Courthouse, 501 I Street Sacramento, California, 95814, Receiver Kenneth Jones (“Receiver”) will and hereby does move this Court, in accordance with Local Civil Rules 230 and 232, for an order relieving Mr. Jones of his duties and substituting Mr. Mark Roberts as Receiver for this matter.

This Motion is based upon: (1) this Notice of Motion and Motion (2) the accompanying Memorandum of Points and Authorities; (3) the Declaration of Kenneth R. Jones filed concurrently herewith; (4) all of the records and papers on file in this action; and (5) such further oral and documentary evidence and argument to be presented at the hearing on this matter.

Dated: August 27, 2025

DLA PIPER LLP (US)

By: /s/ Oliver M. Kiefer
Oliver M. Kiefer

Attorneys for Receiver
Kenneth Jones